

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

ULTIMA SERVICES  
CORPORATION,

*Plaintiff,*

v.

UNITED STATES DEPARTMENT  
OF AGRICULTURE et al.,

*Defendants.*

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)  
) Case No. 2:20-cv-41  
)  
) Judge Clifton L. Corker  
) Magistrate Judge Cynthia  
) Richardson Wyrick  
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**NOTICE OF WITHDRAWAL**

Michelle S. Kallen having entered an appearance in this case on behalf of *Amici* Tunica-Biloxi Tribe of Louisiana and the National Center for American Indian Enterprise Development seeks to withdraw as counsel of record. In support of this notice, Ms. Kallen states as follows:

1. On October 2, 2024, Ms. Kallen filed a notice of appearance in this Court to represent the Tunica-Biloxi Tribe and the National Center for American Indian Enterprise Development in this matter. Dkt. No. 97.

2. On October 2, 2024, counsel from Jenner & Block LLP, Charles W. Galbraith filed a motion pro hac vice to represent the Tunica-Biloxi Tribe and the National Center for American Indian Enterprise Development in this proceeding.

Dkt. Nos. 96. On October 4, 2024, this Court issued orders granting the motions to appear pro hac vice on behalf of the Tunica-Biloxi Tribe and the National Center for American Indian Enterprise Development in this case. Dkt. Nos. 101–102.

3. On November 21, 2024, Ms. Kallen will be leaving the law firm of Jenner & Block LLP. Consequently, she is requesting to withdraw as counsel for the Tunica-Biloxi Tribe and the National Center for American Indian Enterprise Development in this proceeding.

4. Mr. Galbraith will continue to represent the Tunica-Biloxi Tribe and the National Center for American Indian Enterprise Development.

5. *Amici* will not be prejudiced by the withdrawal of Ms. Kallen as Plaintiff’s counsel of record at this time, and Ms. Kallen’s withdrawal will not affect any deadlines.

WHEREFORE, for the reasons stated above and for good cause shown, Michelle S. Kallen respectfully seeks to withdraw as counsel for *Amici* Tunica-Biloxi Tribe and the National Center for American Indian Enterprise Development in this action, that the Clerk’s Office remove her name from the list of individuals who receive docket notices through the CM/ECF system, and for such other and further relief as the Court deems appropriate.

Dated: November 20, 2024

Respectfully submitted,

/s/ Michelle S. Kallen

Michelle S. Kallen (VSB No. 93286)

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*Counsel for Amici*

## **CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on November 20, 2024, a copy of the foregoing document was filed electronically with the Clerk of the Court for the United States Eastern District of Tennessee by using the CM/ECF system which will send a notice of electronic filing to counsel of record.

/s/ *Michelle S. Kallen*

Michelle S. Kallen

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**[PROPOSED] ORDER**

Upon consideration of the motion of Michelle S. Kallen to withdraw as counsel for *Amici* Tunica-Biloxi Tribe of Louisiana and the National Center for American Indian Enterprise Development, and it appearing to the Court that Counsel has presented sufficient cause for her withdrawal and that *Amici* will not be prejudiced by the withdrawal:

It is hereby ADJUDGED, ORDERED, and DECREED that Michelle S. Kallen is granted leave to withdraw as counsel for *Amici* in this action and that the Clerk's Office remove her name from the list of individuals who receive notices through the CM/ECF system for this case.

Entered:

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United States District Court Judge